

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,)
)
Plaintiff,) Cr. A. No. 99-11-JJF
)
v.)
)
COREY MEDLEY,)
)
Defendant.)

DEFENDANT'S MOTION FOR TERMINATION OF SUPERVISED RELEASE

Defendant, Corey Medley, by and through his attorneys, hereby moves this Honorable Court pursuant to 18 U.S.C. §3583(e)(1) for the termination of his supervised release and in support thereof states as follows:

1. Defendant Corey Medley was indicted on January 12, 1999 for two counts of distribution of a mixture containing cocaine base in violation of §841(a)(1) and (b)(1)(A). He signed a Memorandum of Plea Agreement on July 22, 1999, agreeing to plead guilty to one of the two counts in the indictment. Pursuant to his plea agreement Mr. Medley was sentenced on or about October 26, 1999 to serve a total of 6 years incarceration to be followed by 4 years of supervised release. Thereafter, he was incarcerated for 5½ years, primarily at Fairton Correctional Center in New Jersey, followed by 6 months at the Plummer House in Wilmington. He was released from custody and began the 4 year term of supervised release on March 14, 2005.

2. While at Plummer House, Mr. Medley went to school and obtained a CDL license. He also studied for and passed the test administered by the American Traffic Safety Service Association to become a Certified Flagger.

3. After his release, Mr. Medley obtained steady employment. He has worked as a route manager for a Federal Express contractor for the last year. His duties include making 150 – 200 deliveries per 12-hour day within 3 ZIP code areas. In addition he is responsible for developing a route plan and making timely deliveries in accordance with Federal Express' standards and timelines. He has maintained a "no accident" record, while with Federal Express.

4. In addition to maintaining steady employment for the past year, Mr. Medley has also stabilized his personal life. He resides with his mother at 1108 Inverness Circle, New Castle, Delaware 19720. He is in a committed relationship with his longtime girlfriend and has established a relationship with his 10 year old son, who he sees every other weekend and who he talks to by phone on an almost daily basis.

5. Mr. Medley has no obligation to pay any fines or restitution nor is he under any obligation to perform community service. He has been tested several times for drugs since he was placed on probation. Every time, the drug test was negative.

6. Mr. Medley is fully engaged with work and his family and is not at risk to commit criminal acts. He is a first time adult offender, who served his incarceration without incident and who has manifested a clear intention to avoid further criminal conduct. The sentencing goal of deterrence has therefore been met. In addition, he poses no threat to the community.

6. Each time Mr. Medley is required to report for supervision, he must either take off work or make other arrangements with his Supervisor. Because he works in an industry which is extremely time sensitive, the disruptions caused by the required meetings with his probation officer could jeopardize his employment status. Further, every time Mr. Medley seeks a promotion or a new job, he has to reveal not only that he has a record of a felony conviction but also that he is under supervised release. Naturally, many prospective employers are reluctant to

hire someone who not only has a felony record but who is also being actively supervised by a federal probation officer.

7. Because of the foregoing, Mr. Medley hereby requests that this Court change his status from "Supervised" to "Unsupervised."

BIGGS AND BATTAGLIA

By: /s/ Robert D. Goldberg
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DATED: 11/2/2006

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ORDER

This ____ day of _____, 2006, it is hereby ordered that defendant Corey Medley's probation status be and hereby is changed from "Supervised Probation" to "Unsupervised Probation."

IT IS SO ORDERED.

J.

CERTIFICATE OF SERVICE

I, Robert D. Goldberg, undersigned counsel of record, hereby certify that on November 2, 2006, I caused a copy of the attached MOTION FOR TERMINATION OF SUPERVISED RELEASE to be served on the following in the manner indicated:

VIA ELECTRONIC FILING

Hon. Colm F. Connolly
U.S. Attorney's Office
District of Delaware
P. O. Box 2046
Wilmington, DE 19899

/s/ Robert D. Goldberg
Robert D. Goldberg (I.D. #631)